

GEORGE G. WEICKHARDT (SBN 58586)
 WENDY C. KROG (SBN 257010)
 ROPERS, MAJESKI, KOHN & BENTLEY
 201 Spear Street, Suite 1000
 San Francisco, CA 94105-1667
 Telephone: (415) 543-4800
 Facsimile: (415) 972-6301
 gweickhardt@rmkb.com
 wkrog@rmkb.com

Attorneys for Defendant,
 JPMORGAN CHASE BANK, N.A.
 [additional counsel appear on signature page]

Sean P. Reis (Cal. Bar. No. 184044)
 EDELSON MCGUIRE, LLP
 Lakeview Tower
 30021 Tomas Street, Suite 300
 Rancho Santa Margarita, CA 92688
 Telephone: (949) 459-2124
 Facsimile: (949) 459-2123
 sreis@edelson.com

Attorneys for Plaintiffs,
 JEFFREY AND JENIFER SCHULKEN

**IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION**

JEFFREY SCHULKEN AND JENIFER
 SCHULKEN, individually and on behalf of a
 class of similarly situated individuals,
 Plaintiff,
 v.
 WASHINGTON MUTUAL BANK,
 HENDERSON, NEVADA; JPMORGAN CHASE
 BANK, N.A.,
 Defendants.

) CASE NO. 5:09-cv-02708-LHK
)
) **STIPULATION AND PROPOSED**
) **ORDER REGARDING EXTENSION**
) **OF TIME TO PROVIDE CLASS**
) **NOTICE/FILE MOTION FOR**
) **PRELIMINARY APPROVAL**
) Judge: Hon. Lucy H. Koh
)
)

1 WHEREAS, on March 20, 2012, this Court entered an order requiring the parties to
2 file a motion for preliminary approval or dispositive motion by April 6, 2012;

3
4 WHEREAS, the parties have reached an agreement with respect to the relief to be
5 made available to the Class and Subclass members, attorneys' fees and costs, and incentive
6 awards to the Schulken;

7
8 WHEREAS, the parties have exchanged drafts of a written Settlement Agreement,
9 along with drafts of other materials to be submitted in support of the motion for preliminary
10 approval, including a short form mail notice, claim form, and long form notice. Chase is also
11 in the process of retaining a Claims Administrator to facilitate the notice, benefits to class
12 members, and settlement website elements contemplated in the settlement, and to assist with
13 improving the class notices and claim forms;

14 WHEREAS, in order to finalize the settlement agreement and supporting materials,
15 and the parties request an additional three weeks from the April 6, 2012 deadline to submit a
16 motion for preliminary approval, extending the date to April 27, 2012;

17
18 WHEREAS, the requested extension of the deadline to submit a motion for
19 preliminary approval will not interfere with the preliminary approval hearing, which is
20 scheduled for July 19, 2012; and

21 WHEREAS, because the parties have reached a class settlement, they will not be
22 filing dispositive motions and request that the remaining pretrial and trial dates be stricken.
23 The parties' contemplated motion for preliminary approval will contain a request that the
24 Court set dates relating to the settlement, including notice deadline, request for exclusion
25 deadline, and the date for a final approval hearing.

This Stipulation is made in good faith and not for the purposes of delaying the litigation.

Respectfully submitted,

Dated: April 4, 2012

Dated: April 4, 2012

By: /s/ Steven L. Woodrow

By: /s/ Victoria R. Collado

SEAN P. REIS (Cal. Bar. No. 184044)
EDELSON MCGUIRE, LLP
Lakeview Tower
30021 Tomas Street, Suite 300
Rancho Santa Margarita, CA 92688
Telephone: (949) 459-2124
Facsimile: (949) 459-2123
sreis@edelson.com

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San Francisco, CA 94105-1667
Telephone: (415) 543-4800
Facsimile: (415) 972-6301
Email: gweickhardt@rmkb.com
wkrog@rmkb.com

EVAN M. MEYERS
STEVEN L. WOODROW
EDELSON MCGUIRE, LLC
350 N. LASALLE STREET
CHICAGO, ILLINOIS 60654
Telephone: (312) 589-6370
Facsimile: (312) 589-6378
Email: emeyers@edelson.com
swoodrow@edelson.com
Admitted *Pro Hac Vice*

LEANN PEDERSEN POPE
VICTORIA R. COLLADO
TIFFANY SORGE SMITH
BURKE, WARREN, MACKAY
& SERRITELLA, P.C.
330 North Wabash, 22nd Floor
Chicago, IL 60611
Telephone: (312) 840-7000
Facsimile: (312) 840-7900
Email: lpope@burkelaw.com
vcollado@burkelaw.com
tsorgesmith@burkelaw.com
Admitted *Pro Hac Vice*

Attorneys for Plaintiffs,
JEFFREY AND JENIFER SCHULKEN

Attorneys for Defendant,
JPMORGAN CHASE BANK, N.A.

ORDER

Pursuant to the stipulation,
IT IS SO ORDERED.

Dated: April 17, 2012


UNITED STATES DISTRICT JUDGE LUCY H. KOH